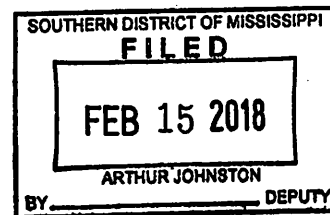


UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



LURETHA O. BIVINS, PRO SE

PLAINTIFF

VERSUS

CIVIL ACTION NO.: 1:18-CV-2-LG-RHW

MISSISSIPPI REGIONAL HOUSING
AUTHORITY VIII

DEFENDANT

PLAINTIFF'S RESPONSE TO DEFENDANT'S ANSWERS AND DEFENSES

Comes now Plaintiff Luretha O. Bivins, Pro Se and responds to Defendant's Answers and
Defenses to complaint

- I. Parties to this complaint
 - A. Deny. Defendant met Plaintiff in federal judge's chamber in a prior lawsuit.
 - B. Admit
 - C. Defendant misrepresented to EEOC that Plaintiff only applied for one position of
Compliance Specialist.
- II. Basis for jurisdiction. This court has jurisdiction.
- III. Statement of Claim
 - A. Claim of employment and age discrimination
 1. Based on federal law, Plaintiff brings a lawsuit of employment discrimination
based on age and race

2. Plaintiff brought similar lawsuit and Plaintiff was threatened, harassed, and fined with bogus invoices
3. In retaliation for bringing a prior suit, Plaintiff was not interviewed and Defendant denied receiving all resumes for several positions which Plaintiff applied
4. Plaintiff sent several resumes for several positions with Defendant; Defendant falsely reported to EEOC that Plaintiff only applied for one position
5. Admit
6. Admit
7. Defendant falsely reported to federal agency that Plaintiff only applied for one position.
8. Defendant misrepresented information to EEOC; Plaintiff sent resume to Defendant prior to March 15, 2017.

B. Defendant knowledge of Plaintiff

1. Defendant arranged for deposition with Plaintiff in the chambers for federal judge; Defendant met with Plaintiff who is African American
2. Age can be calculated by use of resume of date Plaintiff graduated from college
3. Work experience is accurate.
4. Admit
5. Admit
6. Admit

C. Defendant met with Plaintiff in judge's chamber and ascertained all this information. Defendant is misrepresenting information to the court.

IV. Exhaustion of federal administrative remedies. Defendant misrepresented to EEOC, changed job description of Compliance Specialist, and now gives false statements to the court.

A. Plaintiff followed guidelines for age and race discrimination and filed complaint with Mobile, AL EEOC.

B. EEOC did issue Plaintiff a right to sue letter

C. Admit. 60 Days has elapsed since Plaintiff filed a charge of discrimination with EEOC.

V. Relief

1. Plaintiff seeks relief through jury trial

a. Admit

b. Admit

2. Deny

a. Defendant met with Plaintiff in federal judge's chambers and Plaintiff's age was ascertained.

b. Plaintiff was never asked to provide copy of educational transcript.

c. Admit

3. All information submitted to court by Plaintiff is correct including Plaintiff applied several jobs with defendant

VI. Certifications and Closing. Plaintiff has met all guidelines for filing this lawsuit

FIRST DEFENSE

Deny

SECOND DEFENSE

Deny

THIRD DEFENSE

Deny

FOURTH DEFENSE

Deny

FIFTH DEFENSE

Deny

SIXTH DEFENSE

Deny

SEVENTH DEFENSE

Deny. Fall within federal guidelines

EIGHTH DEFENSE

Deny

NINTH DEFENSE

Defendant has unclean hands

TENTH DEFENSE

Deny

ELEVENTH DEFENSE

Jury trial demanded

TWELFTH DEFENSE

Jury trial demanded

THIRTEENTH DEFENSE

Deny

FOURTEENTH DEFENSE

Deny

FIFTEENTH DEFENSE

Deny

SIXTEENTH DEFENSE

Deny

SEVENTEENTH DEFENSE

Deny. Defendant receives federal funding.

EIGHTEENTH DEFENSE

Deny

NINETEENTH DEFENSE

Deny. Plaintiff can provide proof in court.

TWENTIETH DEFENSE

Burden rests with defendant. Defendant refused to address age discrimination with EEOC.

TWENTY-FIRST DEFENSE

Deny

TWENTY- SECOND DEFENSE

Deny

TWENTY- THIRD DEFENSE

Defendant engaged in employment discrimination based on plaintiff's age and race

TWENTY- FOURTH DEFENSE

Deny. Defendant receives federal funding.

Respectfully submitted 12th day of February, 2018.

LURETHA O. BIVINS, PRO SE
P.O. Box 9261
Moss Point, MS 39562-9261
Phone: (228) 366-1053

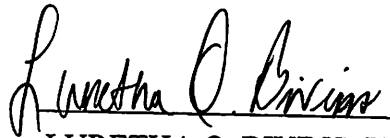
Certificate of Service

This will certify that the undersigned Plaintiff, Luretha O. Bivins Pro Se, has this day served a true and correct copy of the above and foregoing upon Ashley Cannady (for the Defendant) of Balch & Bingham and via U.S. Mail addressed as follows:

Ashley Cannady
188 East Capitol Street
Suite 1400
Jackson, MS 39201
Phone: (601) 961-9900

Said copy sent to Clerk of Court for filing.

This is the 12th day of February, 2018.


LURETHA O. BIVINS, PRO SE